

March 31, 2015

VIA E-MAIL AND ECF

The Honorable Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1610
New York, NY 10007-1312

MEMO ENDORSED

Re: FHFA v. Nomura Holding America Inc., No. 11 Civ. 6201 (DLC)

Dear Judge Cote:

Plaintiff Federal Housing Finance Agency ("FHFA") and Defendants in the above-captioned Action (collectively, the "Parties") write concerning the Court's endorsement of FHFA's March 11, 2015 letter (Dkt. 1426), ordering the Parties to submit a joint report listing the proposed redactions to FHFA's Letters regarding Defendants' hearsay objections to the sample loan files,¹ Defendants' proposed GSE exhibits, and RBSSI's objections to FHFA's exhibit list (collectively, the "Submissions") in *FHFA v. Nomura Holding America Inc.*, No. 11 Civ. 6201 (DLC).

The Parties have met and conferred and agree that the Submissions should be filed in redacted form or under seal, as described in detail below. Pursuant to this Court's prior orders on these subjects and consistent with Sections 2.6, 2.7, 2.8, and 9 of the First Amended Protective Order dated January 11, 2013, the Parties propose to redact or file under seal documents that contain personal information. There is no dispute among the parties as to what materials should be redacted.

The following chart reflects the exhibit to which the Parties are requesting redaction:

<i>FHFA v. Nomura Holding America Inc.</i> , Exhibits to FHFA's Letter Regarding RBS Remaining Exhibit Objections		
Location of redaction	Text to be redacted (highlighted)	Reason for redaction

A highlighted copy of the above-listed exhibit is being submitted to the Court via email.

¹ Exhibit 2 to FHFA's Letter Regarding Defendants' hearsay objections to sample loan files is almost wholly comprised of borrower information that the parties agree should be redacted. For that reason, the parties are in agreement that Exhibit 2 should be filed under seal. Pursuant to the Court's March 30, 2015 Order (Doc. No. 1536), FHFA will file this exhibit on ECF under seal.

Respectfully Submitted,

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